



TransWorld Network, Corp.

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February 27, 2015

Via Electronic Submission (ECFS)

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: TransWorld Network, Corp.
FRN: 0007566961
WC Docket No. 05-25, RM-10593
Special Access Data Reporting

**REDACTED – FOR
PUBLIC INSPECTION**

Dear Ms. Dortch:

TransWorld Network, Corp. ("TransWorld") hereby submits redacted responses to the special access data collection questions applicable to competitive and other providers, consistent with the *Data Collection Protective Order*.¹ TransWorld is submitting its confidential and highly-confidential information through the Commission's Special Access Web Portal.

Any questions concerning this filing should be directed to Lourdes Vinas at 813-891-4700.

Respectfully submitted,

Colin Wood
Chief Executive Officer

Enclosures

¹ *Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket No. 05-25, RM-10593, Order and Data Collection Protective Order, DA 14-1424, released Oct. 1, 2014 ("*Data Collection Protective Order*").

Question II.A.5: Fiber Network Map

Provide a map showing the fiber routes that you (a) own or (b) lease pursuant to an IRU agreement that constitute your network, including the fiber Connections to Locations. In addition, include the locations of all Nodes used to interconnect with third party networks, and the year that each Node went live.

Response:

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[END HIGHLY CONFIDENTIAL INFORMATION]

Question II.A.8: Business Rules for Deployment

Explain your business rule(s) used to determine whether to build a Connection to a particular location. Provide underlying assumptions.

Response: As a competitive wireless internet service provider ("WISP"), TransWorld Network Corp. ("TransWorld") provides Connections to certain locations based upon several factors or business rules.

- a. Describe the business rules and other factors that determine where you build your Connections. Examples of such rules/factors are minimum Term Commitments or minimum capacity commitments by the buyer; maximum build distances from the building to your core network; and/or number of competitors in the area. Include, also, any factors that would prevent you from building a connection to an otherwise suitable Location. These could be factors that are under your control or those that are not.

Response:

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- b. Explain how, if at all, business density is incorporated into your business rules and how you measure business density.

Response:

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[END HIGHLY CONFIDENTIAL INFORMATION]

- c. In areas where your business rule has been most successful, explain why. Provide examples of geographic regions (if any) where you generally were or are able to successfully deploy Connections, and where you have generally experienced or currently experience serious difficulties in deploying Connections, and, if you are able to provide both kind of regions, indicate what distinguishes these different regions.

Response:

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[END HIGHLY CONFIDENTIAL INFORMATION]

Question II.A.10: Marketing Plans

Provide data, maps, information, marketing materials and/or documents identifying those geographic areas where you, or an Affiliated Company, advertised or marketed Dedicated Services over existing facilities, via leased facilities, or by building out new facilities as of December, 31, 2013, or planned to advertise or market services within 24 months of those dates.

Response: As a competitive wireless internet service provider ("WISP"), TransWorld Network Corp. ("TransWorld") provides Dedicated Services on an as-needed basis.

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[END HIGHLY CONFIDENTIAL INFORMATION]

Question II.A.11: Information on Requests for Proposals (RFPs)

Identify the five most recent Requests for Proposals (RFPs) for which you were selected a winning bidder to provide each of the following: (a) Dedicated Services; (b) Best Efforts Business Broadband Internet Access Services; and, to the extent different from (a) or (b), (c) some other form of high-capacity data services to business customers.

Response: As a competitive wireless internet service provider ("WISP"), TransWorld Network Corp. ("TransWorld") does not typically participate in Requests for Proposals ("RFPs") for high capacity data services, but, for those RFPs in which TransWorld did participate and was a winning bidder, TransWorld provides its "highly confidential" response to this question in the Data Container.

Question II.A.11 Part 2:

Not Applicable

Question II.A.18: How do your terms and conditions compare with ILEC offerings?

If you offer Dedicated Services pursuant to an agreement or Tariff that contains either a Prior Purchase-Based Commitment or a Non-Rate Benefit, then explain how, if at all, those sales are distinguishable from similarly structured ILEC sales of DS1s, DS3s, and/or PBDS.

Response:

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[END CONFIDENTIAL INFORMATION]

Question II.A.19: Business Justification for Term and Volume Commitments

Provide the business justification for the Term or Volume Commitments associated with any Tariff or agreement you offer or have in effect with a customer for the sale of Dedicated Services.

Response: As a competitive wireless internet service provider ("WISP"), TransWorld Network Corp. ("TransWorld") does not offer Dedicated Services under a Tariff. TransWorld may offer Term or Volume Commitments associated with an agreement for the sale of Dedicated Services.

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[END HIGHLY CONFIDENTIAL INFORMATION]

Question II.D.1: Short Term and Long Range Strategies

Describe your company's short term and long-range promotional and advertising strategic objectives for winning new – or retaining current – customers for Dedicated Services. In your description, please describe the size (e.g., companies with 500 employees or less, etc.), geographic areas, (e.g., national, southeast, Chicago, etc.), and type of customers your company targets or plans to target through these strategies.

Response: As a competitive wireless internet service provider ("WISP"), TransWorld Network Corp. ("TransWorld") short-term and long-range promotional and advertising strategic objectives for winning new – or retaining current – customers for Dedicated Services vary depending upon several competitive factors, but generally are as follows:

Short Term Strategies:

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[END HIGHLY CONFIDENTIAL INFORMATION]

Long Term Strategies:

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[END HIGHLY CONFIDENTIAL INFORMATION]

Question II.D.2: Location of Recorded Policies

Identify where your company's policies are recorded on the following Dedicated Service related processes: (a) initiation of service; (b) service Upgrades; and (c) service Disconnections. For instance, identify where your company records recurring and non-recurring charges associated with the processes listed above. If recorded in a Tariff, provide the specific Tariff section(s). If these policies are recorded in documents other than Tariffs, list those documents and state whether they are publicly available. If they are publicly available, explain how to find them. For documents that are not publicly available, state whether they are conveyed to customers orally or in writing.

Response: As a competitive wireless internet service provider ("WISP"), TransWorld Network Corp. ("TransWorld") does not offer Dedicated Services pursuant to a Tariff. Company policies and charges associated with initiation of service, service upgrades, and service disconnections can be located in our Terms and Conditions which are publicly available and located on our website: <http://wi-power.com/tos.html>.

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[END CONFIDENTIAL INFORMATION]